

1 ROBERT ATKINS (Admitted *Pro Hac Vice*)  
ratkins@paulweiss.com  
2 JACQUELINE P. RUBIN (Admitted *Pro Hac Vice*)  
jrubin@paulweiss.com  
3 CAITLIN E. GRUSAUSKAS (Admitted *Pro Hac Vice*)  
cgrusauskas@paulweiss.com  
4 ANDREA M. KELLER (Admitted *Pro Hac Vice*)  
akeller@paulweiss.com  
5 **PAUL, WEISS, RIFKIND, WHARTON**  
**& GARRISON LLP**

6 1285 Avenue of the Americas  
7 New York, NY 10019  
8 Telephone: (212) 373-3000

9 RANDALL S. LUSKEY (SBN: 240915)  
rluskey@paulweiss.com  
10 MARC PRICE WOLF (SBN: 254495)  
mpricewolf@paulweiss.com  
11 **PAUL, WEISS, RIFKIND, WHARTON**  
**& GARRISON LLP**  
12 535 Mission Street, 25th Floor  
13 San Francisco, CA 94105  
14 Telephone: (628) 432-5100

15 *Attorneys for Defendants*  
16 UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC

17 [Additional Counsel Listed on Following Page]

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 IN RE: UBER TECHNOLOGIES, INC., Case No. 3:23-md-03084-CRB  
22 PASSENGER SEXUAL ASSAULT  
23 LITIGATION

**DECLARATION OF RANDALL S. LUSKEY  
IN SUPPORT OF DEFENDANTS' MOTION  
FOR RELIEF FROM NONDISPOSITIVE  
PRETRIAL ORDER OF MAGISTRATE  
JUDGE**

24 This Document Relates to:  
25 ALL ACTIONS

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

1 KYLE N. SMITH (*Pro Hac Vice* admitted)  
ksmith@paulweiss.com  
2 JESSICA E. PHILLIPS (*Pro Hac Vice* admitted)  
jphillips@paulweiss.com  
3 **PAUL, WEISS, RIFKIND, WHARTON**  
**& GARRISON LLP**  
4 2001 K Street, NW  
Washington DC, 20006  
5 Telephone: (202) 223-7300  
Facsimile: (202) 223-7420  
6

7 LAURA VARTAIN (SBN 258485)  
laura.vartain@kirkland.com  
8 **KIRKLAND & ELLIS LLP**  
555 California Street  
9 San Francisco, CA 94104  
Telephone: (415) 439-1625  
10

*Attorneys for Defendants*  
11 UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC  
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**DECLARATION OF RANDALL S. LUSKEY**

I, Randall S. Luskey, declare pursuant to 28 U.S.C. § 1746:

1. I am over 18 years of age, of sound mind, and competent to make the statements in this declaration. I am an attorney at law duly licensed to practice before all courts of the State of California and a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in the above-captioned matter. I have personal knowledge of the facts set forth herein, except where stated upon information and belief, and if called as a witness to testify, I could and would competently testify as to the truth of the same if requested to do so.

2. I submit this declaration in support of Uber's Motion for Relief from the Nondispositive Pretrial Order of Magistrate Judge Cisneros dated March 24, 2025, Dkt. No. 2600.

3. Attached to this declaration as **Exhibit 1** is a true and correct copy of the Declaration of Dara Khosrowshahi submitted in support of Uber's Memorandum of Points and Authorities in support of its Motion for a Protective Order, dated February 28, 2025, Dkt. 2425.

4. Attached to this declaration as **Exhibit 2** is a true and correct copy of the Declaration of Jill Hazelbaker submitted in support of Uber's Memorandum of Points and Authorities in support of its Motion for a Protective Order, dated February 28, 2025, Dkt. 2425.

5. Attached to this declaration as **Exhibit 3** is a true and correct copy of the Order on Plaintiffs' Renewed Request to Depose Sundar Pichai, entered in *Brown v. Google LLC*, No. 20-cv-03664-YGR (SVK), Dkt. No. 758 (N.D. Cal. Sept. 26, 2022).

6. Attached to this declaration as **Exhibit 4** is a true and correct copy of the Order on Uber’s Motion to Quash and for Protective Order, entered in *In re: Uber Rideshare Cases*, No. CJC-21-005188 (Cal. Super. Ct. Jan. 9, 2025).

7. Attached to this declaration as **Exhibit 5** are true and correct excerpts from the certified transcript of the March 26, 2025 deposition of Henry Gustav Fuldner and excerpts from the rough transcript of the March 27, 2025 deposition of Henry Gustav Fuldner coordinated between *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”) and this litigation.

8. Attached to this declaration as **Exhibit 6** are true and correct excerpts from the November 13, 2024 deposition of Matthew Baker taken in the JCCP.

9. Attached to this declaration as **Exhibit 7** are true and correct excerpts from the November 19, 2024 deposition of Roger Kaiser taken in the JCCP.

10. Attached to this declaration as **Exhibit 8** are true and correct excerpts from the October 15, 2024 deposition of Andi Pimentel taken in the JCCP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 7, 2025 in San Francisco, California.

/s/ Randall S. Luskey

Randall S. Luskey